

KLARIS

June 23, 2025

Via ECF

Hon. Sidney H. Stein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

MEMO ENDORSED

Re: In re: OpenAI, Inc., Copyright Infringement Litigation, 1:25-md-03143-SHS-OTW
This Document Relates To: Ziff Davis, Inc. et al v. OpenAI, Inc. et al., Case
No. 25-cv-04315-SHS-OTW ("Ziff Davis")

Dear Judge Stein:

Plaintiffs Ziff Davis, Inc., Ziff Davis, LLC, IGN Entertainment, Inc., and Everyday Health Media, LLC ("Plaintiffs") respectfully request a 14-day extension of the deadline for opposing OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OPCO LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC's ("Defendants") Motion to Dismiss ("Motion"). ECF No. 138. Plaintiffs have in turn consented to a 14-day extension for Defendants to file their reply.

Plaintiffs' deadline to oppose the Motion is currently June 24, 2025. This is each party's first request for an extension in the Ziff Davis matter. Defendants consent to mutual extensions. Plaintiffs respectfully request that your Honor extend the deadline for Plaintiffs to file any opposition until **July 8, 2025**, and for Defendants to file any reply until **July 29, 2025**.

Respectfully submitted,

/s/ Lacy H. Koonce, III

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cc: All Counsel of Record (via ECF)

6/26/25
So ordered
Fischer H Stein
USDC